

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION

CAROLENG INVESTMENTS LIMITED,

Plaintiff,

v.

BLUESTONE RESOURCES, INC.,

Defendant.

Index No. 1:2023mc00010

**APPLICATION FOR WRIT OF
EXECUTION**

Pursuant to Federal Rule of Civil Procedure 69(a)(1), Judgment Creditor Caroleng Investments Limited (“Judgment Creditor”) applies to the Court for the issuance of the Writ of Execution directed to Judgment Debtor Bluestone Resources, Inc., (“Judgment Debtor”), which is attached as **Exhibit A**, and the delivery of the Executed Writ of Execution to the United States Marshals Service, Roanoke Division, for levy on the Judgment Debtor’s property in this district in accordance with the USM-295 Form attached hereto as **Exhibit B**.

Judgment Creditor seeks execution on a judgment entered by the United States District Court for the District of Delaware, Case No. 1:20-cv-01793 on June 7, 2021 (the “Judgment”), and subsequently registered in the United States District Court for the Western District of Virginia, Abingdon Division, the instant Case no. 1:2023mc00010, on July 24, 2023. The Judgment was issued in favor of the Judgment Creditor and against the Judgment Debtor in the amount of the final award of \$8,408,723.56, plus pre-award interest of \$1,723,796.64, for a total amount of

\$10,132,520.20¹, plus interest at the simple rate of 9% per annum from May 13, 2020 until payment, of which the entire amount currently remains unpaid.

The Judgment Debtor's last known address is 302 S. Jefferson St., Roanoke, VA, 24011.

The Judgment Debtor was represented in the Delaware action by John Anderson Sensing, Potter Anderson & Corroon, LLP, 1313 N. Market St., Hercules Plaza, 6th Flr., Wilmington, DE 19899-0951. Judgment Debtor is believed to own a helicopter that is based in Roanoke, which may be stored in a secured area in this district, possibly at the Roanoke Regional Airport. Accordingly, the Judgment Creditor asks this Court to authorize, through the proposed writ, that the United States Marshal and/or the Judgment Creditor enter a secured space, if necessary by force, to seize the Judgment Debtor's property. The Judgment Creditor asks to be named as substitute custodian for the United States Marshals, maintaining sole and direct responsibility for any attached property.

WHEREFORE, the Judgment Creditor respectfully requests the Court issue a Writ of Execution, in the form proposed, directing the United States Marshal to execute said Writ, authorizing the Judgment Creditor and/or the U.S. Marshal to enter secured areas, if necessary, by force, in furtherance of said Writ, and awarding costs as incurred by the United States Marshal in executing said Writ.

DATED: September 22, 2023

/s/ Steven L. Higgs
Steven L. Higgs, Esq. (VSB # 22720)
Steven L. Higgs, P.C. (VSB # 90566)
9 Franklin Road, Southwest
Roanoke, Virginia 24011-2403

SARACHEK LAW FIRM

/s/ Zachary E. Mazur
Zachary E. Mazur, Esq

¹ The Judgment also awards the Judgment Creditor additional, unliquidated amounts that are not being presently enforced.

Email: zachary@saracheklawfirm.com
Telephone: (646) 519-4396
670 White Plains Road – Penthouse Suite
Scarsdale, New York 10583
Attorneys for the Judgment Creditor